

Message

From: Smith, Barbara [Smith.Barbara@epa.gov]
Sent: 3/29/2017 6:54:09 PM
To: pizarro, luis [pizarro.luis@epa.gov]
Subject: Momentive conf. call summary 3-29-2017

Hi all ---

The following is what I understood from the conference call regarding the 'Soil Management Plan (SMP) Wastewater Treatment Unit Upgrade Project' at the Momentive Performance Materials, Inc. Facility in Sistersville, WV.

There were two issues raised by the PCB data presented in the SMP regarding how to proceed with regard to TSCA and RCRA Corrective Action. They are:

Q.1.: Is the SMP adequate regarding Momentive's approach to soil management/soil disposal of soil potentially containing PCBs excavated for the new construction.

Answer: Yes. However, EPA is requesting that soil left in the excavation foot print for the equalization tank be sampled (post excavation) so that EPA and WV can confirm whether the equalization tank will satisfy the conditions of it being a 'cap' over any remaining PCB soil left in place. The threshold level for EPA is, if PCB levels left are below 100 ppm, than soil can be capped as a final remedy under RCRA Corrective Action.

Q.2.: What about the area between the proposed EQ tank and the primary clarifiers and settling basin where soil was sampled to a depth of 20 feet bgs in 2008 or 2009, showing areas of elevated PCBs (PCB > 100 ppb, and two samples > 1,000 ppb) ?

Answer: Post construction of the EQ tank and associated structures, this area should be revisited under the existing RCRA Corrective Action Permit with WV, regarding what clean up or capping may be required.

Although EPA requested a more detailed excavation/construction plans for new construction from Momentive, that is no longer necessary.

Momentive will document evidence that the PCB contaminated soil was placed prior to 1978 by a previous owner.

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